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U.S. District Court  
Eastern District of MO

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED  
FEB 05 2018  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

Elaine Cao  
*Plaintiff*

-v-

Chess Club and Scholastic Center of St. Louis  
*Defendant*

Case No. 4:17-cv-02736-HEA

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO AMEND COMPLAINT**

Plaintiff wishes to add damages in emotional distress. Because of the extreme and outrageous actions that I allege were committed by the Defendant, I experienced homelessness and housing instability for a period from July 2016 to December 2016, and am still relying partially on the goodwill of a friend. Further, as many of the senior officers of the Club are people who I have personally known for over half of my life, there is a very intense sense of betrayal from a community in which I spent many of my formative years. The pain was so damaging that I had blocked it out completely, and did not realize that it was legally actionable until after my Complaint was reported on in local news media.

Finally, because the scope and depth of emotional distress is best determined by a jury, I would like to modify the Complaint to request a trial by jury.

WHEREFORE, Plaintiff respectfully requests that the Court grant the Plaintiff's Motion to Amend Complaint.

Respectfully submitted,  
Elaine Cao

3211 S Grand Blvd, Apt 2F  
St. Louis, MO 63118  
Cell: 314 295 1600  
email: elainecao93@gmail.com  
Pro se plaintiff

